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### UNITED STATES DISTRICT COURT

### DISTRICT OF NEVADA

LEVELS NETWORK, INC., a Delaware corporation; and AW BETEILIGUNGS GMBH, a limited liability company organized under the laws of Germany,

Plaintiffs,

VS.

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JONAS FREY, an individual,

Case Number: 2:21-CV-01796-RFB-BNW

# AINTIFFS' MOTION FOR PRELIMINARY INJUNCTION **IECF NO. 81**

(First Request)

Defendant.

Pursuant to LR IA 6-1 and 6-2, Plaintiffs Levels Network, Inc. and AW Beteiligungs GMBH (collectively "Plaintiffs"), by and through their counsel of record, Kevin Murphy, Esq. (phv) of Wuersch & Gering LLP, and Brian W. Boschee and James B. Boyle, of Holley Driggs and Defendant Jonas Frey, by and through his counsel of record, Brian R. Hardy, Esq., of Marquis Aurbach Coffing, hereby stipulate and agree to extend the briefing schedule for Plaintiffs' Motion for Preliminary Injunction [ECF No. 8], as set forth in the Court's Minute Order dated October 20, 2021 [ECF No. 18]. This Stipulation is being entered in good faith and not for purposes of delay. This is the parties first request for an extension to the briefing schedule.

- 1. On September 29, 2021 Plaintiffs filed their Motion for Preliminary Injunction. ECF No. 8.
  - 2. On October 7, 2021 Defendant was served with the Complaint.

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- 3. On October 20, 2021, the Court issued a minute order that ordered Defendant to respond to the Motion for Preliminary Injunction on or before October 21, 2021 and Plaintiffs' to file their reply on or before October 28, 2021. ECF No. 18.
- The parties agree to extend the briefing schedule set by the Court in order to continue with good faith discussions to reach a resolution of the issues raised in the Motion for Preliminary Injunction, and potentially in the case overall.
- 5. The parties further agree that, should the Motion for Preliminary Injunction not be resolved between the parties, the Defendant's response brief will then be due on or before October 28, 2021.
- 6. The parties further agree that, should the Motion for Preliminary Injunction not be resolved between the parties, Plaintiffs' reply will be due on or before November 4, 2021.
- 7. The parties further agree to submit a proposed joint protective order to the Court on or before October 28, 2021. This will assist in at least the facilitation of a settlement of the Motion for Preliminary Injunction. Upon submission to the Court, the parties will abide by the terms of the agreed proposed joint protective order until otherwise ordered by the Court.

IT IS SO STIPULATED.

Dated this 21st day of October, 2021
HOLLEY DRIGGS
By
James D. Boyle, Esq.
Brian W. Boschee, Esq.
400 South 4th Street 3rd Floor

WUERSCH & GERING LLP

Las Vegas, Nevada 89101

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Attorneys for Plaintiffs AW Beteiligungs
& Levels Network, Inc.

Dated this 21st day of October, 2021

MARQUIS AURBACH COFFING

By:
Brian R. Hardy, Esq.
Nevada Bar No. 10068
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for Defendant Jonas Frey

## **ORDER**

IT IS SO ORDERED this 21st day of October, 2021.

RICHARD F. BOOLWARE, II United States District Court

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